

The following are comments on Petition for Rulmaking RM-11347 submitted by Glen E. Zook and received by the Commission on May 19, 2006. In this petition, the Commission is asked to amend Rule 97.119(a) to require an amateur station to transmit the call signs of the stations with which it is communicating, and identify itself at the beginning and end of each transmission.

Zook cites infrequent identification as a common problem on FM repeaters, the result being “confusion as to which station is transmitting at what time.” In my experience, on-the-air conduct is related to the level of rule enforcement imposed by the organizations and control operators that sponsor and manage repeaters. Infrequent identification is caused by a lack of such enforcement, not by any inadequacy of the current rules.

Zook’s proposal to require a station to identify itself and the stations it is communicating with would place an unnecessary burden on all amateur operators. Each operator need only be responsible for identifying himself.

As a radio amateur, I find the current rules for station identification easy to understand and follow. When they are obeyed, the result is adequate, timely identification of active operators and those with whom they are communicating. Better rule enforcement by repeater owners would do more to solve the problems cited by Zook. I see no compelling reason to adopt the petition.

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